

DAVIS WRIGHT TREMAINE LLP

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Attorneys for Plaintiff  
AMAZON.COM, INC. and AMAZON TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

AMAZON.COM, INC., a Delaware corporation,  
and AMAZON TECHNOLOGIES, INC.,

Plaintiff,

v.

UMER WASIM, et al.,

Defendants.

Case No. 4:23-cv-05580-DMR

**DECLARATION OF EMILY GOODELL  
IN SUPPORT OF MOTION FOR  
ALTERNATIVE SERVICE**

DAVIS WRIGHT TREMAINE LLP

I declare under penalty of perjury under laws of the State of California that the foregoing is true and correct.

1. I am over the age of eighteen and am competent to testify as to the matters set forth herein. I have personal knowledge of the facts in this declaration, and base this declaration on my personal knowledge.

2. I work for the law firm Davis Wright Tremaine (“DWT”), which represents Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc., in this matter.

3. On November 9, 2023 I directed the service of Defendant Muhammad Usman Khan (“MU Khan”) at 13116 Peach Leaf Place, Fairfax, VA 22030, an address that was provided on the publicly filed Articles of Incorporation for entities VTLOGODESIGN Inc., and MK Affiliates Inc. See Exhibit A.

4. On November 15, 2023, I received a response from process server Mark Hagood that on November 15, 2023, at 10:17 am, he spoke with a male, “Rahn” at 13116 Peach Leaf Place, Fairfax, VA 22030 “who stated the individual we are seeking has not lived here for several years. He stated he is *[sic]* lives in California”.

5. I searched online, and also requested that my firm’s research librarians search public records, and was not able to identify any California address linked to Muhammad Usman Khan.

6. On April 20, 2023, I received an email forwarded by an individual identified in the Complaint as “Victim 4” which indicated that a process server working for Patriot Process Service had attempted to serve a Notice to Appear on recipient Muhammad Usman Khan at 13116 Peach Leaf Place, Fairfax, VA 22030 on February 22, 2023. A “description of service” said that,

“After approximately 10-15 minutes, a female answered video door bell told me he (defendant) does not live here.,. she stated although she has a last name similar to/same as his (defendant’s) last name, she doesn’t know him. She told me that she owns the house. She was very annoyed in her voice tone stating that unknown people have been recently

1 ringing her doorbell a lot knocking on her door looking for defendant (prior to me) and  
2 that she may file a lawsuit for harassment.”

3 7. On November 3, 2023, a representative from Crowe Foreign Services informed  
4 me that a hired investigator was not able to locate the address provided for Mavia Nizam, 1/22  
5 Shah Faisal Colony, Karachi, Sindh, 75700, PK.

6 8. I directed the service of Defendants MU Khan, Yasir Agar (“Agar”), and  
7 Muhammad Shiraz Qureshi (“Qureshi”), at addresses in Pakistan, in a manner consistent with the  
8 Hague Service Convention, through the company Crowe Foreign Services, and received  
9 confirmation that service documents had been sent to the Pakistan Central Authority on  
10 November 28, 2023.

11 9. On November 13, 2023, a representative from Crowe Foreign Services indicated  
12 that Hague Convention service in Pakistan “is unpredictable and unreliable with time frames  
13 considered extreme” and “can take anywhere from 3 to 9 months because it is under the control  
14 of the Pakistan Ministry of Justice and no request for expedited service is acknowledged”.

15 10. I have reviewed a document filed in the United States District Court in the Middle  
16 District of Florida, case 6:22-cv-00798-PGB-GJK, that indicates that “United States’ counsel at  
17 the Federal Trade Commission conferred with Defendant Muhammad Usman Khan by phone  
18 and email”. See Exhibit B. Attorney Ellen Bowden McIntyre certified that defendants, including  
19 Muhammad Usman Khan, were being served by electronic mail and U.S. Mail on April 26, 2022  
20 to email addresses [mkkhan@voipterminator.com](mailto:mkkhan@voipterminator.com), and [usman@khans.pk](mailto:usman@khans.pk), and a physical address  
21 in Pakistan, House Number 1301 Service Road D121, Islamabad, Pakistan. *Id.*

22 11. I have reviewed Amazon.com, Inc. business records, which indicate that an  
23 account using the name “vtlogodesign inc” [*sic*] and email address  
24 [vtlogodesignincamz@gmail.com](mailto:vtlogodesignincamz@gmail.com) was registered on July 25, 2022. Both addresses and payment  
25 methods on the account are listed with the names “VTLOGODESIGN, INC”, and “Muhammad  
26 Usman Khan”.

27 12. On October 31, 2023, on behalf of plaintiffs, I sent correspondence via registered  
28 email to Defendant MU Khan at [mkkhan@voipterminator.com](mailto:mkkhan@voipterminator.com), [usman@khans.pk](mailto:usman@khans.pk), and

1 vtlogodesignincamz@gmail.com. I received confirmation that the email to usman@khans.pk was  
 2 delivered, and that the email sent to the vtlogodesignincamz@gmail.com was delivered and  
 3 opened. See Exhibit C. I have not received a response.

4 13. I have reviewed an Amended Complaint filed in relation to Uniform Domain  
 5 Name Dispute Resolution Policy (“UDRP”) Decision FA2305002043019, which lists the  
 6 registrant for amazonprovinc.com and amazonkindleprovinc.com as “Yasir Agar”, with a contact  
 7 email address of yasiragar7@gmail.com, physical address of “Main Bahadurabad, Karachi,  
 8 Sindh 74800 PK” and the registrant for amazonkindlebookpublishing.com as “Yasir Agar” with  
 9 a contact email address of yasir@smartstartupsolutions.com, and physical address of “Zulekha  
 10 palace, BMCHS, Karachi, Sindh 74800, PK”.

11 14. I have reviewed an Amended Complaint filed in relation to UDRP Decision  
 12 FA2307002053542, which lists the registrant for amazonkdpublishers.com, as “Yasir Agar” with  
 13 a contact email address of yasir@smartstartupsolutions.com, and physical address of “Zulekha  
 14 palace, BMCHS, Karachi, Sindh 74800, PK”.

15 15. I have reviewed publicly available WHOIS data for the following domains  
 16 registered by Yasir Agar; amazonprovinc.com, amazonkindlebookpublishing.com,  
 17 amazonkindleprovinc.com, amazonkdpublishers.com, and determined that registrant Yasir Agar  
 18 used the registrar GoDaddy.com, LLC to register these domains.

19 16. I have reviewed an Amended Complaint filed in relation to UDRP Decision  
 20 FA2307002053540, which lists the registrant for amazonpublishingzone.com, as “Pennielynn  
 21 stiansen” [*sic*] with a contact email address of mavianizam96@gmail.com.

22 17. I have reviewed an Amended Complaint filed in relation to UDRP Decision  
 23 FA2305002043019, which lists the registrant for amazondigitalpro.com as “mavia nizam” [*sic*]  
 24 and amazonpublisherpro.com as “Ali Alam”, both with a contact email address of  
 25 mavianizam96@gmail.com. The contact address for “mavia nizam” [*sic*] is “1/22 Shah Faisal  
 26 Colony Karachi, Karachi, Sindh 75700, PK”.

27 18. I have reviewed publicly available WHOIS data for the following domains;  
 28 amazondigitalpro.com, amazonpublisherpro.com, and amazonpublishingzone.com, and

determined that the registrant using email address mavianizam96@gmail.com used the registrar GoDaddy.com, LLC to register these domains.

19. I have reviewed an Amended Complaint filed in relation to UDRP Decision FA2307002053542, which lists the registrant for amzkindlepublishing.com, as “Muhammad Shiraz Qureshi” with a contact email address of creativewebstudio4@gmail.com, a physical address in Australia, and a phone number with Pakistan country code +92.

20. I have reviewed I have reviewed Amazon.com, Inc. business records, which indicate that an account using the name “Muhammad Shiraz qureshi” [*sic*] and email address shiraziqureshi.@gmail.com was registered on August 28, 2018. An address added to the account with the name “M Shiraz Qureshi” is n-121 Pechs Block 2, Karachi, Sindh, PK.

21. On September 28, 2023, a representative from Crowe Foreign Services informed me that a hired investigator was able to confirm the addresses provided for and individual with the name Muhammad Shiraz Qureshi at n-121 Pechs Block 2, Karachi, PK, and a Yasir Agar at Flat 402, 4<sup>th</sup> Floor, Zulekha palace, Plot #15, BMCHS, Sharfabad, Karachi, PK.

22. I have reviewed publicly available WHOIS data for the domain amzkindlepublishing.com and determined that registrant Muhammad Shiraz Qureshi used the registrar Namecheap Inc. to register this domain.

23. I have reviewed GoDaddy.com LLC’s current Domain Name Registration Agreement, available at the URL <https://www.godaddy.com/legal/agreements/domain-name-registration-agreement>, which states at Section 5 that;

“You agree to notify GoDaddy within five (5) business days when any of the information you provided as part of the application and/or registration process changes. It is your responsibility to keep this information in a current and accurate status. Failure by you, for whatever reason, to provide GoDaddy with accurate and reliable information on an initial and continual basis, shall be considered to be a material breach of this Agreement and a basis for suspension and/or cancellation of the domain name. Failure by you, for whatever reason, to respond within five (5) business days to any inquiries made by GoDaddy to determine the validity of information provided by you, shall also be

1 considered to be a material breach of this Agreement and a basis for suspension and/or  
 2 cancellation of the domain name.”

3 24. I have reviewed Namecheap Inc.’s current Registration Agreement, available at  
 4 the URL <https://www.namecheap.com/legal/domains/registration-agreement/>, which states at  
 5 Section 14 that;

6 “As further consideration for the Service(s), you agree to provide certain current,  
 7 complete and accurate information about you, both with respect to your account  
 8 information and with respect to the WHOIS information for your domain name(s) for all  
 9 domains purchased through Namecheap. You agree to maintain and update this  
 10 information as needed to keep it current, complete and accurate. With respect to you, the  
 11 administrative, technical, and billing contacts for your domain name registration(s) and  
 12 other Service(s), Namecheap requires that you must submit the following for both gTLDs  
 13 and ccTLDs: name, postal address, e-mail address, voice telephone number, and, if  
 14 available, fax number.”

15 25. On October 31, 2023, on behalf of plaintiffs, I sent correspondence via registered  
 16 email to Defendant Agar at [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com), and [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com). I  
 17 received confirmation that the email to [yasir@smartstartupsolutions.com](mailto:yasir@smartstartupsolutions.com) was delivered, and a  
 18 second confirmation that the email sent to the [yasiragar7@gmail.com](mailto:yasiragar7@gmail.com) was delivered and opened.  
 19 See Exhibit D. I have not received a response.

20 26. On October 31, 2023, on behalf of plaintiffs, I sent correspondence via registered  
 21 email to Defendant Nizam at [mavianizam96@gmail.com](mailto:mavianizam96@gmail.com). I received confirmation that the email  
 22 was delivered and opened. See Exhibit E. I have not received a response from this email address  
 23 to this outreach.

24 27. On October 31, 2023, on behalf of plaintiffs, I sent correspondence via registered  
 25 email to Defendant Qureshi at [creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com) and [shiraziqureshi@gmail.com](mailto:shiraziqureshi@gmail.com). I  
 26 received confirmation that both emails were delivered and opened. See Exhibit F. I have not  
 27 received a response from this email address to this outreach.  
 28

28. I have been forwarded a copy of an email received by Amazon's outside counsel from mavianizam96@gmail.com, on September 19, 2023, in relation to UDRP FA2305002043019, indicating that it was written by Defendant Ali Alam, and stating that Mavia Nizam is an employee of his, that has used the same email address to register domains. See Exhibit G.

29. I have been forwarded a copy of an email received by Amazon's outside counsel from creativewebstudio4@gmail.com, on September 20, 2023, in relation to UDRP FA2307002053542, indicating that it was written by Defendant Qureshi. See Exhibit H.

30. Obtaining a stipulation for the proposed relief is not possible because, although Plaintiffs have begun service the approximately fifteen U.S.-based Defendants, no Defendants have yet formally appeared in the case. There is no Defendant with a filed appearance with whom Plaintiffs can enter a stipulation.

Executed this 4<sup>th</sup> day of December, 2023 in Seattle, Washington.

By: s/ Emily Goodell  
Emily Goodell

DAVIS WRIGHT TREMAINE LLP

## **EXHIBIT A**



# **Electronic Articles of Incorporation For**

**P20000072174  
FILED  
September 09, 2020  
Sec. Of State  
Iskervin**

VTLOGODESIGN, INC.

The undersigned incorporator, for the purpose of forming a Florida profit corporation, hereby adopts the following Articles of Incorporation:

## **Article I**

The name of the corporation is:

VTLOGODESIGN, INC.

## **Article II**

The principal place of business address:

1317 EDGEWATER DR #156  
ORLANDO, . 32804

The mailing address of the corporation is:

1317 EDGEWATER DR #156  
ORLANDO, . 32804

## **Article III**

The purpose for which this corporation is organized is:

ANY AND ALL LAWFUL BUSINESS.

## **Article IV**

The number of shares the corporation is authorized to issue is:

100000

## **Article V**

The name and Florida street address of the registered agent is:

VOIPTERMINATOR INC  
250 INTL PKWY  
108  
LAKE MARY, FL. 32746

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: MUHAMMAD USMAN KHAN

P20000072174  
FILED  
September 09, 2020  
Sec. Of State  
Iskervin

### **Article VI**

The name and address of the incorporator is:

MUHAMMAD USMAN KHAN  
13116 PEACH LEAF PLACE

FAIRFAX, 22030

Electronic Signature of Incorporator: MUHAMMAD USMAN KHAN

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

### **Article VII**

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P  
MUHAMMAD USMAN KHAN  
13116 PEACH LEAF PLACE  
FAIRFAX, VA. 22030

### **Article VIII**

The effective date for this corporation shall be:

09/01/2020

# **Electronic Articles of Incorporation For**

**P22000036855  
FILED  
April 29, 2022  
Sec. Of State  
tburch**

MK AFFILATES INC.

The undersigned incorporator, for the purpose of forming a Florida profit corporation, hereby adopts the following Articles of Incorporation:

## **Article I**

The name of the corporation is:

MK AFFILATES INC.

## **Article II**

The principal place of business address:

1317 EDGEWATER DR #6151  
ORLANDO, FL. 32804

The mailing address of the corporation is:

1317 EDGEWATER DR #6151  
ORLANDO, FL. 32804

## **Article III**

The purpose for which this corporation is organized is:

ANY AND ALL LAWFUL BUSINESS.

## **Article IV**

The number of shares the corporation is authorized to issue is:

100000

## **Article V**

The name and Florida street address of the registered agent is:

KELLY MILLER  
1317 EDGEWATER DRIVE  
ORLANDO, FL. 32804

I certify that I am familiar with and accept the responsibilities of registered agent.

Registered Agent Signature: KELLY MILLER

P22000036855  
FILED  
April 29, 2022  
Sec. Of State  
tburch

### **Article VI**

The name and address of the incorporator is:

MUHAMMAD USMAN KHAN  
13116 PEACH LEAF PL

FAIRFAX, VA 22030

Electronic Signature of Incorporator: MUHAMMAD USMAN KHAN

I am the incorporator submitting these Articles of Incorporation and affirm that the facts stated herein are true. I am aware that false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S. I understand the requirement to file an annual report between January 1st and May 1st in the calendar year following formation of this corporation and every year thereafter to maintain "active" status.

### **Article VII**

The initial officer(s) and/or director(s) of the corporation is/are:

Title: P  
MUHAMMAD USMAN KHAN  
13116 PEACH LEAF PL  
FAIRFAX, VA. 22030

### **Article VIII**

The effective date for this corporation shall be:

04/30/2022

## **EXHIBIT B**

**UNITED STATES DISTRICT COURT  
IN THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VOIP TERMINATOR, INC., a corporation,

BLMARKETING, INC., a corporation, and

MUHAMMED USMAN KHAN, individually and  
as an officer of VOIP TERMINATOR, INC. and  
BLMARKETING, INC.,

Defendants.

Case No. \_\_\_\_\_

**UNITED STATES' CONSENT MOTION FOR ENTRY OF CONSENT DECREE**

The United States respectfully moves the Court for entry of the attached Stipulated Order for Permanent Injunction, Civil Penalty Judgment, and Other Relief ("Consent Decree") with the Defendants' consent. *See* Ex. 1 (Consent Decree). The United States requests that the Court sign and enter the attached Consent Decree as its final order and judgment in this case.

**Local Rule 3.01(g) Certification**

On April 26, 2022, the United States' counsel at the Federal Trade Commission conferred with Defendant Muhammed Usman Khan by phone and email. On behalf of all three Defendants, Mr. Khan consented to the filing of this motion and entry of the Consent Decree.

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

ARUN G. RAO  
Deputy Assistant Attorney General

ROGER B. HANDBERG  
United States Attorney  
Middle District of Florida

s/ Lacy R. Harwell, Jr.  
LACY R. HARWELL, JR.  
Chief, Civil Division  
Florida Bar No. 714623  
400 N. Tampa Street, Suite 3200  
Telephone: (813) 274-6000  
Facsimile: (813) 274-6200  
Email: Randy.Harwell@usdoj.gov

GUSTAV W. EYLER  
Director  
Consumer Protection Branch

LISA K. HSIAO  
Assistant Director

s/ Ellen Bowden McIntyre  
ELLEN BOWDEN MCINTYRE  
ZACHARY A. DIETERT  
Trial Attorneys Appearing pursuant to 28 U.S.C. § 517  
Consumer Protection Branch  
U.S. Department of Justice  
P.O. Box 386  
Washington, DC 20044  
Telephone: (202) 451-7731  
Email: ellen.bowden.mcintyre@usdoj.gov  
Telephone: (202) 616-9027  
Email: zachary.a.dietert@usdoj.gov

### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing is being served by electronic mail and U.S. Mail on April 26, 2022 to the following:

Muhammed Usman Khan  
Individually and as an officer of VOIP Terminator, Inc., and BLMarketing, Inc.  
House Number 1301 Service Road D121  
Islamabad, Pakistan  
Email: [mkhan@voipterminator.com](mailto:mkhan@voipterminator.com)  
[usman@khans.pk](mailto:usman@khans.pk)

s/ Ellen Bowden McIntyre  
Trial Attorney



## **EXHIBIT C**

**Goodell, Emily**

**From:** Receipt <receipt@r1.rpost.net>  
**Sent:** Tuesday, October 31, 2023 6:40 PM  
**To:** Goodell, Emily  
**Subject:** Receipt: <https://protect-us.mimecast.com/s/1tabCn5z6LhZz1zZf9QDMB?domain=amazon.com, Inc. Notice of Litigation and Preservation Demand>  
**Attachments:** DeliveryReceipt.xml; HtmlReceipt.htm

[EXTERNAL]

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| Delivery Status                |                                       |   |                              |                        |                        |
|--------------------------------|---------------------------------------|---|------------------------------|------------------------|------------------------|
| Address                        | Status                                | Details   | Delivered (UTC*)             | Delivered (local)      | Opened (local)         |
| finance@mkaffiliatenetwork.com | Delivered to Mail Server              | relayed: <a href="#">mx1-hosting.jellyfish.systems (198.54.127.242)</a> | 10/31/2023 11:01:37 PM (UTC) | 10/31/2023 11:01:37 PM |                        |
| jakefreed@dwt.com              | Delivered and Opened                  | HTTP-IP: 155.130.12.68  | 10/31/2023 11:01:38 PM (UTC) | 10/31/2023 11:01:38 PM | 10/31/2023 11:16:17 PM |
| usman@khans.pk                 | Delivered to Mail Server              | relayed: <a href="#">aspmx.l.google.com (173.194.76.27)</a>             | 10/31/2023 11:01:38 PM (UTC) | 10/31/2023 11:01:38 PM |                        |
| mkhan@voipterminator.com       | Secondary Dispatch - Delivery Failure |   | ***                          | ***                    |                        |
| vtlogodesignincamz@gmail.com   | Delivered and Opened                  | HTTP-IP: 66.249.92.160  | 10/31/2023 11:01:39 PM (UTC) | 10/31/2023 11:01:39 PM | 10/31/2023 11:06:38 PM |

\*UTC represents Coordinated Universal Time: <https://www.rmail.com/resources/coordinated-universal-time/>

| Message Envelope                 |   |
|----------------------------------|---|
| <b>From:</b>                     | Goodell, Emily <EmilyGoodell@dwt.com>   |
| <b>Subject:</b>                  | <a href="#">Amazon.com</a> , Inc. Notice of Litigation and Preservation Demand                              |
| <b>To:</b>                       | <finance@mkaffiliatenetwork.com> <usman@khans.pk> <mkhan@voipterminator.com> <vtlogodesignincamz@gmail.com> |
| <b>Cc:</b>                       | <jakefreed@dwt.com>   |
| <b>Bcc:</b>                      |   |
| <b>Network ID:</b>               |   |
| <b>Received by RMail System:</b> | 10/31/2023 11:01:34 PM (UTC)  |
| <b>Client Code:</b>              |   |

| Message Statistics      |  |
|-------------------------|--|
| <b>Tracking Number:</b> | ADC63A71D96498B8B211EDEC6C89AE8DB60E693B |
| <b>Message Size:</b>    | 6790637                                  |

## **EXHIBIT D**

**Goodell, Emily**

**From:** Receipt <receipt@r1.rpost.net>  
**Sent:** Tuesday, October 31, 2023 6:21 PM  
**To:** Goodell, Emily  
**Subject:** Receipt: [https://protect-us.mimecast.com/s/UeLMCADmKBCKgPGmHGdAmW?](https://protect-us.mimecast.com/s/UeLMCADmKBCKgPGmHGdAmW?domain=amazon.com, Inc. Notice of Litigation and Preservation Demand)  
**Attachments:** DeliveryReceipt.xml; HtmlReceipt.htm

[EXTERNAL]



## REGISTERED RECEIPT

EVIDENCE OF DELIVERY, CONTENT & TIME



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| Delivery Status                 |                          |  |                              |                        |                        |
|---------------------------------|--------------------------|--|------------------------------|------------------------|------------------------|
| Address                         | Status                   | Details  | Delivered (UTC*)             | Delivered (local)      | Opened (local)         |
| jakefreed@dwt.com               | Delivered to Mail Server | relayed; <a href="https://us-smtp-inbound-1.mimecast.com">us-smtp-inbound-1.mimecast.com</a> (205.139.110.141) | 10/31/2023 11:21:19 PM (UTC) | 10/31/2023 11:21:19 PM |                        |
| yasir@smartstartupsolutions.com | Delivered to Mailbox     | Delivery confirmed by recipient mail server at <a href="https://technologies.org">technologies.org</a>         | 10/31/2023 11:21:19 PM (UTC) | 10/31/2023 11:21:19 PM |                        |
| yasiragar7@gmail.com            | Delivered and Opened     | HTTP-IP:74.125.208.98  | 10/31/2023 11:21:18 PM (UTC) | 10/31/2023 11:21:18 PM | 10/31/2023 11:27:30 PM |

\*UTC represents Coordinated Universal Time: <https://www.rmail.com/resources/coordinated-universal-time/>

| Message Envelope                 |  |
|----------------------------------|--|
| <b>From:</b>                     | Goodell, Emily <EmilyGoodell@dwt.com>  |
| <b>Subject:</b>                  | <a href="#">Amazon.com</a> , Inc. Notice of Litigation and Preservation Demand |
| <b>To:</b>                       | <yasir@smartstartupsolutions.com> <yasiragar7@gmail.com>                       |
| <b>Cc:</b>                       | <jakefreed@dwt.com>  |
| <b>Bcc:</b>                      |  |
| <b>Network ID:</b>               |  |
| <b>Received by RMail System:</b> | 10/31/2023 11:21:15 PM (UTC)   |
| <b>Client Code:</b>              |  |

| Message Statistics      |   |
|-------------------------|---|
| <b>Tracking Number:</b> | 79CBF40FABA726F416A0DCF8FF863D6015EA96CA  |
| <b>Message Size:</b>    | 6788620   |
| <b>Features Used:</b>   |   |
| <b>File Size:</b>       | <b>File Name:</b>   |
| 4.6 MB                  | Amazon v. Wasim -Complaint [1] - 10.30.2023.pdf   |
| 104.2 KB                | Amazon Notice of Litigation Agar.pdf  |

| Delivery Audit Trail |
|----------------------|
|----------------------|

## **EXHIBIT E**

**Goodell, Emily**

**From:** Receipt <receipt@r1.rpost.net>  
**Sent:** Tuesday, October 31, 2023 6:15 PM  
**To:** Goodell, Emily  
**Subject:** Receipt: <https://protect-us.mimecast.com/s/Eb3ZCn5z6LhZz16Wi9w3ce?domain=amazon.com, Inc. Notice of Litigation and Preservation Demand>  
**Attachments:** DeliveryReceipt.xml; HtmlReceipt.htm  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[EXTERNAL]

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To authenticate this receipt, forward this email with its attachment to 'verify@r1.rpost.net' or [click here](#)

| Delivery Status        |                          |  |                              |                        |                        |
|------------------------|--------------------------|--|------------------------------|------------------------|------------------------|
| Address                | Status                   | Details  | Delivered (UTC*)             | Delivered (local)      | Opened (local)         |
| jakefreed@dwt.com      | Delivered to Mail Server | relayed; <a href="https://us-smtp-inbound-2.mimecast.com">us-smtp-inbound-2.mimecast.com</a> (205.139.110.141) | 10/31/2023 11:15:20 PM (UTC) | 10/31/2023 11:15:20 PM |                        |
| mavianizam96@gmail.com | Delivered and Opened     | HTTP-IP:66.249.92.160  | 10/31/2023 11:15:21 PM (UTC) | 10/31/2023 11:15:21 PM | 10/31/2023 11:16:48 PM |

\*UTC represents Coordinated Universal Time: <https://www.rmail.com/resources/coordinated-universal-time/>

| Message Envelope                 |  |
|----------------------------------|--|
| <b>From:</b>                     | Goodell, Emily <EmilyGoodell@dwt.com>  |
| <b>Subject:</b>                  | <a href="#">Amazon.com</a> , Inc. Notice of Litigation and Preservation Demand |
| <b>To:</b>                       | <mavianizam96@gmail.com>   |
| <b>Cc:</b>                       | <jakefreed@dwt.com>  |
| <b>Bcc:</b>                      |  |
| <b>Network ID:</b>               |  |
| <b>Received by RMail System:</b> | 10/31/2023 11:15:17 PM (UTC)   |
| <b>Client Code:</b>              |  |

| Message Statistics      |   |
|-------------------------|---|
| <b>Tracking Number:</b> | D7A6558A9DDD88FBE394CD0E668CE8C6AB7FF77D  |
| <b>Message Size:</b>    | 6788494   |
| <b>Features Used:</b>   |   |
| <b>File Size:</b>       | <b>File Name:</b>   |
| 4.6 MB                  | Amazon v. Wasim -Complaint [1] - 10.30.2023.pdf   |
| 104.3 KB                | Amazon Notice of Litigation Nizam.pdf   |

**Delivery Audit Trail**

## **EXHIBIT F**

**Goodell, Emily**

**From:** Receipt <receipt@r1.rpost.net>  
**Sent:** Tuesday, October 31, 2023 6:18 PM  
**To:** Goodell, Emily  
**Subject:** Receipt: https://protect-us.mimecast.com/s/3vVDCo2OXMUVm1v9u12sh-?domain=amazon.com, Inc. Notice of Litigation and Preservation Demand  
**Attachments:** DeliveryReceipt.xml; HtmlReceipt.htm  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

[EXTERNAL]



**REGISTERED RECEIPT**  
 EVIDENCE OF DELIVERY, CONTENT & TIME

**This receipt contains verifiable proof of your RPost transaction.**



The holder of this receipt has proof of delivery, message and attachment content, and official time of sending and receipt. Depending on services selected, the holder also may have proof of encrypted transmission and/or electronic signature.

To authenticate this receipt, forward this email with its attachment to 'verify@r1.rpost.net' or [click here](#)

| Delivery Status              |                          |  |                              |                        |                        |
|------------------------------|--------------------------|--|------------------------------|------------------------|------------------------|
| Address                      | Status                   | Details  | Delivered (UTC*)             | Delivered (local)      | Opened (local)         |
| creativewebstudio4@gmail.com | Delivered and Opened     | HTTP-IP:66.249.92.163                                    | 10/31/2023 11:18:25 PM (UTC) | 10/31/2023 11:18:25 PM | 10/31/2023 11:26:55 PM |
| jakefreed@dwt.com            | Delivered to Mail Server | relayed;us-smtp-inbound-1.mimecast.com (205.139.110.141) | 10/31/2023 11:18:26 PM (UTC) | 10/31/2023 11:18:26 PM |                        |
| shiraziqureshi@gmail.com     | Delivered and Opened     | HTTP-IP:74.125.208.107                                   | 10/31/2023 11:18:25 PM (UTC) | 10/31/2023 11:18:25 PM | 10/31/2023 11:27:08 PM |

\*UTC represents Coordinated Universal Time: <https://www.rmail.com/resources/coordinated-universal-time/>

| Message Envelope                 |  |
|----------------------------------|--|
| <b>From:</b>                     | Goodell, Emily <EmilyGoodell@dwt.com>  |
| <b>Subject:</b>                  | <a href="#">Amazon.com</a> , Inc. Notice of Litigation and Preservation Demand |
| <b>To:</b>                       | <creativewebstudio4@gmail.com> <shiraziqureshi@gmail.com>                      |
| <b>Cc:</b>                       | <jakefreed@dwt.com>  |
| <b>Bcc:</b>                      |  |
| <b>Network ID:</b>               |  |
| <b>Received by RMail System:</b> | 10/31/2023 11:18:22 PM (UTC)   |
| <b>Client Code:</b>              |  |

| Message Statistics      |   |
|-------------------------|---|
| <b>Tracking Number:</b> | 65AAC03F950EE3F5F51A768AC8E96823E108B212  |
| <b>Message Size:</b>    | 6789277   |
| <b>Features Used:</b>   |   |
| <b>File Size:</b>       | <b>File Name:</b>   |
| 4.6 MB                  | Amazon v. Wasim -Complaint [1] - 10.30.2023.pdf   |
| 104.6 KB                | Amazon Notice of Litigation Qureshi.pdf   |



## **EXHIBIT G**

## Goodell, Emily

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**From:** mavia nizam <mavianizam96@gmail.com>  
**Sent:** Tuesday, September 19, 2023 1:46 PM  
**To:** Jim Struthers  
**Cc:** [REDACTED]  
**Subject:** Domain Name Dispute - Case No. 2043019 and claim no Claim Number: FA2305002043019  
  
**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

**CAUTION:** This email originated from outside of the organization.

Hello Jim and other parties,

I apologize for any delay in handling the Domain Name Dispute Complaint. Although we've previously submitted a formal response, we acknowledge that it might not have been properly received, and we are still dedicated to achieving a harmonious resolution. As we spoke on call yesterday I am explaining everything and keeping everyone in cc too.

I have a case number and file no ( **Case No. 2043019 and claim no Claim Number: FA2305002043019** ) against me and other parties and i would like to share details :

I, Ali Alam ([mavianizam96@gmail.com](mailto:mavianizam96@gmail.com)) is entirely unaffiliated with the parties named Atlas Technologies/Usama Sheikh/ Yasir Agar/Zohaib Asad/Abdul Rafay Bin Zia/Muhammad Kashif/MadCom Digital/Salem Merchants/Canvas Digital/Web Design Stop/Ghost Rider/Publishing Domains/Bruce Adam/Abraham Lincoln/Logozeal/Jazib Ullah/JazibUllah/Alex/OctaLogo/平 亥UDRP

I acquired the website address, [www.amazonpublisherpro.com](http://www.amazonpublisherpro.com), with honest intentions on behalf of the client, without any knowledge of possible trademark disputes. Importantly, there has been no business operations conducted using this web address, and we promptly disabled it upon learning of the circumstances.

I would also like to inform you that one of my employees, Mavia Nizam using the same email on different registrar , also had a domain named [www.amazondigitalpro.com](http://www.amazondigitalpro.com). We have successfully relocated and transferred all assets to Amazon. I would like to say that their transfer was promptly executed upon receipt of an email from the forum requesting the transfer 1st time.

Furthermore, in my capacity as a proxy for the client who requested me to acquire the domain under my own name, I am currently in the process of dissociation my name and concluding this matter, given that the domain has already been transferred. Additionally, I willingly relinquished control of the "[www.amazonpublisherpro.com](http://www.amazonpublisherpro.com)" and "[www.amazondigitalpro.com](http://www.amazondigitalpro.com)" domain for the transfer process, which has since been successfully accomplished. Additional details and clarification can be made available through the forum or email. It is worth noting that I previously communicated via email with the forum, and subsequent to that communication, the domain transfer was executed.

I want my name and mavia's name to be removed from the forum or any case as I have already did what's been asked from me and got this sorted as soon, I got to know.

We appreciate your cooperation in expeditiously resolving this matter in a fair and equitable manner and for a confirmation that I must do nothing with other parties and with this case anymore.

Sincerely,  
Ali Alam  
[mavianizam96@gmail.com](mailto:mavianizam96@gmail.com)

## **EXHIBIT H**

**Goodell, Emily**

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**From:** Creative web studio <creativewebstudio4@gmail.com>  
**Sent:** Wednesday, September 20, 2023 2:33 PM  
**To:** Jim Struthers; Jeanna A.  
**Cc:** [REDACTED]  
**Subject:** Legal Matter: Amazon Technologies, Inc. v. Alex / OctaLogo / Yasir Agar / MMUHAMMAD SHIRAZ QURESHI / Core Cut / IT Company - Case Number: FA2307002053542

**CAUTION: This email originated from outside of the organization.**

Dear,

I trust this correspondence finds you in good health. I write in response to your recent communication pertaining to the case bearing File Number FA2307002053542, Amazon Technologies, Inc. v. Alex / OctaLogo / Yasir Agar / MUHAMMAD SHIRAZ QURESHI / Core Cut / IT Company, on behalf of Mr. Muhammad Shiraz Qureshi ([creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com)).

First and foremost, we extend our apologies for any delay in our response to the Domain Name Dispute Complaint submitted by the Complainant. We wish to clarify that a formal response to the aforementioned complaint had been previously tendered, though we believe it may not have been duly received or acknowledged. We wish to reaffirm our steadfast commitment to the collaborative resolution of this matter.

It is imperative to emphasize that Mr. Muhammad Shiraz Qureshi ([creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com)) maintains no affiliations whatsoever with the parties identified as Alex / OctaLogo or Yasir Agar, Core Cut, and IT Company. He remains entirely unacquainted with their identities, having never engaged in any correspondence or associations with them. We have made diligent efforts to establish contact with the other implicated entities. Our communication with Yasir Agar, Core Cut, and IT Company has borne fruit, as they have willingly acknowledged their involvement and promptly conveyed their intention to relinquish the disputed domain, thereby aligning with Mr. Qureshi's amicable resolution stance. Regrettably, we have been unable to establish contact with the party known as Alex / OctaLogo, and we remain committed to its resolution.

For further clarity, we wish to underscore the salient points conveyed to us by our client about the acquisition of the domain in question:

1. **Genuine Intent:** The registration of the Domain Name was executed in good faith, with a bona fide intention to employ it for services related to book publishing, editing, and marketing support. At the time of registration, there existed no knowledge of potential trademark conflicts.
2. **Absence of Commercial Activity:** To date, there have been no business operations conducted under the Domain Name [www.amzkindlepublishing.com](http://www.amzkindlepublishing.com). No customer interactions, sales, or transactions have been associated with the website. Immediate steps were taken to deactivate the website upon our awareness of the situation.
3. **Explicit Disclaimer:** In order to preclude any misconceptions or misleading impressions, a disclaimer was prominently featured on the website, explicitly stating that it is unaffiliated with Amazon Technologies, Inc. and not endorsed by the corporation.
4. **Personal Creative Portfolio:** The book cover designs, and imagery showcased on the website

[www.amzkindlepublishing.com](http://www.amzkindlepublishing.com) are constituent elements of Mr. Qureshi's personal creative portfolio, serving as a testament to his freelance work on behalf of clients. These materials are in no manner intended to create an association with Amazon Technologies, Inc., or its product offerings.

5. Swift Resolution: Mr. Muhammad Shiraz Qureshi ([creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com)) is resolute in avoiding any business activities that could potentially engender confusion with Amazon Technologies, Inc., and its trademarked assets. Consequently, he extends a voluntary and immediate offer to relinquish and transfer ownership of the Domain Name to Amazon Technologies, Inc.

6. Absence of Associations: It is imperative to clarify that Mr. Qureshi bears no connections to the individuals or entities cited in the complaint, including their names and email addresses. He maintains no familiarity with these parties, and their involvement in this matter bears no relevance to his registration and utilization of the Domain Name. His sole connection to the Domain Name lies in his capacity as its registered owner, acquired on behalf of his client. We assert that his actions remain autonomous and unrelated to the other parties mentioned in the complaint. Additionally, Mr. Qureshi has barred the client in question and ceased further collaboration.

Additionally, we wish to highlight that the aforementioned elucidations have been relayed to us by Mr. Muhammad Shiraz Qureshi's client, for whom he procured and maintained ownership of the Domain Name. Mr. Qureshi ([creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com)) acted in the capacity of a representative for his client and executed the registration in strict accordance with the client's explicit instructions and intentions. The Domain Name never belonged to him, and he retained it solely as an agent for his client. The client provided detailed rationale for the registration, as delineated in points 1 through 6, upon Mr. Qureshi's request for clarification.

Furthermore, in a spirit of cooperation aimed at expeditiously resolving this matter, we wish to draw your attention to the voluntary surrender of an additional domain, "[www.amzkindlepublishing.com](http://www.amzkindlepublishing.com)," in addition to Domain Case No. 2053542. Copies of previous email correspondence affirming this surrender are appended herewith. We have accorded full rights for the transfer of the mentioned domain to your organization and promptly deactivated it upon our awareness of the situation. These actions underscore our unwavering commitment to facilitating a prompt and equitable resolution.

We kindly beseech you to view this response as our utmost cooperation with the administrative proceedings and request the transfer of the Domain Name to Amazon Technologies, Inc. upon acceptance of this voluntary transfer proposal.

Should you or the Panel require further elucidation or additional information from us, we stand prepared to be at your service through FORUM or by responding to this email.

We extend our gratitude for your understanding and cooperation in this matter and eagerly anticipate a judicious and equitable resolution to the dispute.

Yours sincerely,

Muhammad Shiraz Qureshi ([creativewebstudio4@gmail.com](mailto:creativewebstudio4@gmail.com))